

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

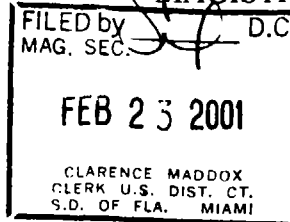
UNITED STATES OF AMERICA,
Plaintiff

CASE NO: 00-6311-CR-HUCK

vs.

KEITH LAMPKIN, et al,
Defendants.

MAGISTRATE JUDGE BROWN



EX-PARTE MOTION FOR COSTS
TO OBTAIN DISCOVERY PURSUANT TO THE
CRIMINAL JUSTICE ACT 18USC 3006A

COMES NOW, the Defendant, KEITH LAMPKIN, by and through the undersigned attorney, pursuant local rule 7.1 of the Southern District and 18USC 3006(, hereinafter the Criminal Justice Act, and would request that this honorable court execute the enclosed CJA voucher # 21 addressed to International Legal Imprints in the amount of \$3, 483.84 (Three Thousand Four Hundred Eighty Three Dollars and Eighty Four Cents) so that court-appointed counsel may obtain discovery. As grounds for this request undersigned would state as follows:

(1) Undersigned counsel was appointed to represent Keith Lampkin pursuant to the Criminal Justice Act.

(2) The Defendant, Keith Lampkin, is charged along with 13 other co-defendant's in a 38 page indictment. The indictment covers a four year time span beginning in 1996. The indictment charges Mr. Lampkin and the other co-defendant's with among other things: Conspiracy to further an enterprise through a pattern of racketeering in violation of 18USC 1962(d); Conspiracy to import marijuana and cocaine in violation of 21USC 963; Conspiracy to possess with intent to distribute marijuana and cocaine in violation of 21USC 846; Money laundering in violation of 18USC 1956-

Law Offices of Steven H. Kassner

815 PONCE DE LEON BLVD, SUITE 303 • CORAL GABLES, FLORIDA 33134 • TELEPHONE: (305) 461-2744


1957; and Extortion in violation of 18USC 1957. The government estimates that this case will take forty five (45) trial days to complete.

(3) The government in their initial response to the pre-trial discovery order indicated that there were a number of documents and other communications that they would rely on at trial. These documents are contained in 12 file boxes currently in the possession of International Legal Imprints, 150 S.E. 2nd Avenue, Suite 800, Miami, Florida 33131. Counsel contacted International Legal Imprints and was told that the boxes contain 28, 405 standard documents and 76 color documents. International Legal Imprints informed counsel that the general documents would cost 12¢ per-page to copy, while the color documents would cost 99¢ per-page to copy. The total cost to copy all documents is \$3, 483.84.

(4) As drafted, the indictment filed by the government puts Mr. Lampkin in every major count of the indictment. Counsel is in need of the documents and communications contained in the governments initial discovery response in order to be in a position to adequately defend Mr. Lampkin. Therefore counsel would request that this honorable court authorize payment in an amount of \$3, 483.84. Counsel has attached a CJA voucher addressed to International Legal Imprints for this amount.

Wherefore counsel requests that this honorable court grant the relief prayed for in this ex-parte motion for costs.

Respectfully submitted,
Steven Kassner, Esq.
815 Ponce De Leon Blvd.
Coral Gables, Florida 33134
(305) 461-2744

BY 
STEVEN H. KASSNER
Florida Bar Number 372331

Law Offices of Steven H. Kassner